

# EXHIBIT A

CHOATE

CHOATE HALL & STEWART LLP

Sarah Chapin Columbia  
(617) 248-5053  
scolumbia@choate.com

May 2, 2006

**BY FAX**

Lisa M. Fleming  
Bromberg & Sunstein  
125 Summer Street  
Boston, MA 02110-1618

RE: ScanSoft, Inc. v. Voice Signal Technologies, Inc.

Dear Lisa:

We have just received electronic notice of the court's docket order granting ScanSoft's Motion to Allow Its Independent Expert Access to VST's First Year Source Code. As it is evident that the Court made a mistake in ruling on the Motion without considering our opposition (which is not due until May 12), we have this afternoon filed an emergency motion to stay the Court's Order. I expect that until the Court has ruled on the Motion to Stay you will not give Dr. Goldhor access to Voice Signal source code.

Sincerely,



Sarah Chapin Columbia

SCC:mld

**CHOATE**

CHOATE HALL & STEWART LLP

# Fax

**CONFIDENTIAL**

Recipient	Company	Fax	Phone
Lisa Fleming	Bromberg & Sunstein	(617)443-0004	
From	Sarah Chapin Columbia	Number of Pages	
Date	May 2, 2006	Client Number	
Phone	(617) 248-5053	Operator	Time Sent

## Comments

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# EXHIBIT B

Exhibits: (None) Volume 1, Pages 1 - 175

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----  
SCANSOFT, INC.,

Plaintiff

vs.

Docket No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES,  
INC., et al.,

Defendants  
-----

MEETING WITH NEUTRAL EXPERT

Friday, March 24, 2006, 9:10 a.m.

Bromberg & Sunstein LLP

125 Summer Street

Boston, Massachusetts

***TRANSCRIPT CONTAINS MATERIAL DESIGNATED "HIGHLY  
CONFIDENTIAL" and "HIGHLY CONFIDENTIAL - DESIGNATED  
COUNSEL'S EYES ONLY"***

----- Janis T. Young, RDR, CRR -----

Farmer Arsenault Brock LLC

Boston, MA | 617-728-4404 | Fax 617-728-4403

1     **PRESENT:**

2             Prof. Dr.-Ing Hermann Ney

3                 RWTH-Aachen

4                 Computer Science Department

5                 Ahornstr. 55, D-52056

6                 Aachen, Germany

7                 as neutral expert

8  
9             Lee Carl Bromberg, Esq.

10            Erik Paul Belt, Esq.

11            Lisa M. Fleming, Esq.

12            M. Brad Lawrence, Esq.

13            Courtney M. Quish, Esq.

14                 Bromberg & Sunstein LLP

15                 125 Summer Street

16                 Boston, Massachusetts 02110-1618

17                 617-443-9292         Fax 617-443-0004

18                 lbromberg@bromsun.com; ebelt@bromsun.com;

19                 lfleming@bromsun.com; blawrence@bromsun.com;

20                 cquish@bromsun.com

21                 for Plaintiff

22  
23             (Continued)

3

1 Sarah Chapin Columbia, Esq.

2 Robert S. Frank, Jr., Esq.

3 Christopher J. McKenna, Esq.

4 Choate Hall & Stewart LLP

5 Two International Place

6 Boston, Massachusetts 02110

7 617-248-5000 Fax 617-248-4000

8 scolumbia@choate.com; rfrank@choate.com;

9 cmckenna@choate.com

10 for Defendant

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12

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171

1 part missing. I would have to point out the exact  
2 functions that would be considered.

3 MR. FRANK: Yes.

4 MR. BELT: I guess that's what I would  
5 suggest, is --

6 DR. NEY: So I think there's more to be  
7 done on my side.

8 MR. BELT: Yes.

9 MR. FRANK: So from that, it follows, I  
10 think, that at our next session together we should  
11 have a session comparable to the session we had  
12 today on trade secrets, at the end of which you  
13 would articulate exactly which parts of the code you  
14 wanted to see. I think if we try to do that now,  
15 you're not far enough along in your understanding to  
16 do it properly.

17 DR. NEY: Yes; right.

18 MS. COLUMBIA: I guess one thing we  
19 didn't maybe run to the ground was whether at the  
20 next meeting, I think Dr. Ney has said that it would  
21 be helpful to him to have -- each party have an  
22 expert who could answer questions at a level that  
23 would be helpful to him.

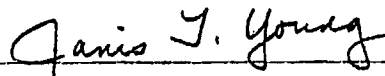
24 Are we all in agreement that it's okay



174

C E R T I F I C A T E

I, Janis T. Young, Registered Professional  
Reporter, do hereby certify that the foregoing  
transcript is a true and accurate transcription of  
my stenographic notes taken on March 24, 2006, in  
the above-captioned matter.



Janis T. Young, RDR/CRR

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175

## I N D E X

SESSIONS	PAGES
Plenary sessions	4 - 48 149 - 173
All Defendant's counsel	49 - 54 73 - 96 99 - 105
Defendant's designated counsel only	55 - 72 97 - 98
All Plaintiff's counsel	106 - 123 131 - 148
Plaintiff's designated counsel only	124 - 130